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1 UNITED STATES DISTRICT COURT
2 SOUTHERN DISTRICT OF NEW YORK

3 -----X
4 ADRIAN SCHOOLCRAFT,

5 Plaintiff,

Case No:

6 - against -

10 CV 06005

7 THE CITY OF NEW YORK, ET AL.,

8 Defendants.
9 -----X

10 111 Broadway

11 New York, New York

12 May 15, 2014

13 10:28 a.m.

14
15
16 DEPOSITION OF SALVATORE SANGENITI, pursuant to
17 Notice, taken at the above place, date and
18 time, before DENISE ZIVKU, a Notary Public
19 within and for the State of New York.
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3 A P P E A R A N C E S:

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BY: GREGORY J. RADOMISLI, ESQ.

1 S T I P U L A T I O N S:

2 IT IS HEREBY STIPULATED AND AGREED by
3 and between the attorneys for the respective
4 parties hereto, that this examination may be
5 sworn to before any Notary Public.

6
7 IT IS FURTHER STIPULATED AND AGREED
8 that the filing and certification of the said
9 examination shall be waived.

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11 IT IS FURTHER STIPULATED AND AGREED
12 that all objections to questions, except as to
13 the form of the question, shall be reserved
14 for the time of trial.

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Q. This is the videotaped deposition of Sal Sangeniti.

A. Yes.

MR. SMITH: And we are at the my office at 111 Broadway. It's May 15, 2014.

MR. RADOMISLI: I just want to state pursuant to the Federal Rules, we reserve the right to review and correct the deposition transcript and also, it's a videotaped deposition. The deposition just happens to be you're videotaping it.

MR. SMITH: Right. Understood. I am videotaping the deposition and the court reporter is here taking the deposition.

Would you mind swearing in the witness.

S A L V A T O R E S A N G E N I T I, a Witness herein, having been first duly sworn by a Notary Public within and for the State of New York, was examined and testified as follows:

1 S. SANGENITI

2 Q. What is emergency management?

3 A. Overseeing it would take like
4 mass casualty incidents and break it down
5 and give you what you needed to do while at
6 the scene of these assignments.

7 Q. When did you graduate high
8 school?

9 A. 1978.

10 MR. RADOMISLI: -- didn't
11 graduate high school.

12 A. Oh, I'm sorry, I didn't graduate
13 high school.

14 Q. Oh, I'm sorry. Okay. What was
15 your -- after you finished your course of
16 studying as a young person, what was your
17 first form of employment?

18 A. Health and Hospitals
19 Corporation.

20 Q. Is it fair to say your first
21 gainful work was an EMT?

22 A. As -- yeah.

23 Q. Yes?

24 A. Yes.

25 Q. What kind of training did you

1 S. SANGENITI

2 have in order to get that position?

3 A. You needed to attend an
4 emergency medical technician course.

5 Q. And you did?

6 A. I did. 1980.

7 Q. You passed that course in 1980?

8 A. Yes.

9 Q. And what did you do from 1980 to
10 1984?

11 A. Probably numerous jobs.

12 Q. As an EMT or other things?

13 A. Other things.

14 Q. Can you tell me what those other
15 jobs were?

16 A. I worked in a bakery, I worked
17 for a security company at Kennedy Airport.
18 That's probably what I --

19 Q. Were you a security guard at
20 Kennedy?

21 A. We did the screening for to get
22 onto the plane. That was prior to TSA.

23 Q. And then in 1984 you started
24 actively working as an EMT?

25 A. Yes.

1 S. SANGENITI

2 were police vehicles, patrol cars, ESU
3 trucks.

4 Q. What are Jimmys?

5 A. Blazers, I'm sorry.

6 Q. Is that a four-wheel upright
7 vehicle?

8 A. I think so, yes.

9 Q. What kinds of trucks, other than
10 the ESU trucks were at the scene?

11 A. Just the patrol cars.

12 Q. How many ESU vehicles were at
13 the scene?

14 A. I think just one.

15 Q. Did you see any ESU personnel at
16 the scene?

17 A. I saw one ESU officer.

18 Q. How was that one ESU officer
19 attired?

20 A. In uniform.

21 Q. Did you see civilians on the
22 street?

23 A. No.

24 Q. What time of the day or evening
25 was it when you got there?

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1 S. SANGENITI

2 MR. RADOMISLI: You could look
3 at records.

4 Q. Yeah, if you want to look at the
5 PCR.

6 A. 9:06. So 9:00.

7 Q. About 9:00 you got to the scene?

8 A. Correct.

9 Q. When you got to the scene, you
10 really had no information about what kind of
11 circumstances or situation you were
12 responding to, right?

13 A. Correct. It was an unknown
14 condition. That's what came over the
15 terminal.

16 Q. Is that common to get an
17 unknown?

18 A. Oh, sure. It's whatever is
19 conveyed to the 911 operator.

20 Q. When you got to the scene where
21 did you park?

22 A. By the corner of Myrtle Avenue
23 and 88 Place.

24 Q. How long was the drive from
25 where you were at when you got the

1 S. SANGENITI

2 retake it?

3 A. Oh, sure.

4 Q. It happens frequently?

5 MR. RADOMISLI: Objection.

6 A. It happens.

7 Q. Does it happen that the reason
8 why the numbers seem different is because
9 you had a hard time hearing?

10 A. No.

11 Q. No. Then why is it important
12 that the room be quiet?

13 A. It assists you in evaluating the
14 condition.

15 Q. So if a radio was blaring in the
16 background while you're taking blood
17 pressure, that would interfere with your
18 ability to hear or take a blood pressure
19 reading, right?

20 MR. RADOMISLI: Objection.

21 A. Yes.

22 Q. What blood pressure reading did
23 you get from Officer Schoolcraft?

24 A. Like 160 over 120.

25 Q. The record should reflect that

1 S. SANGENITI

2 you're looking at the second page of the PCR
3 and you're looking at assessment for the
4 first of the initial assessment; is that
5 right?

6 A. Correct.

7 Q. You don't, sitting here today,
8 remember getting that reading, you're just
9 relying on the PCR, right?

10 A. Correct.

11 Q. Other than getting the top and
12 bottom number, what else did you do when you
13 were taking Schoolcraft's vitals?

14 A. His pulse, taking his pulse, his
15 respiration, listening to his lungs.

16 Q. Did you listen to his lungs?

17 A. I did.

18 Q. Did you take his pulse?

19 A. I did.

20 Q. Are these readings here, 120 for
21 pulse and 20 for respiration, the readings
22 that you got?

23 A. Yes.

24 Q. Did you make those entries on
25 this chart?

1 S. SANGENITI

2 document is all Marquez?

3 A. Correct.

4 Q. None of it's yours?

5 A. Correct.

6 Q. What does the blood pressure
7 reading of 160 over 120 mean to you?

8 A. Person's in hypertensive -- not
9 really hypertensive crisis.

10 Q. What does that mean?

11 A. It's -- normal blood pressure is
12 approximately 110 over 70, 120 over 80, 160
13 over 120 is a little high.

14 Q. Is that an emergency situation?

15 A. We were there so, yeah, sure.

16 Q. No, I didn't ask you about that.

17 A. Is that condition, yes.

18 Q. So 160 over 120 is an emergency
19 situation?

20 A. Yes.

21 Q. Does, in your experience, a
22 blood pressure reading like that require you
23 immediately take the person to the hospital?

24 A. After evaluation, yes.

25 Q. Did you take Schoolcraft to the

1 S. SANGENITI

2 A. No.

3 Q. Did you tell anybody at the
4 scene that Officer Schoolcraft had to go to
5 the hospital against his will?

6 A. No.

7 Q. Other than the suggestions that
8 you made to the Schoolcraft that he ought to
9 go to the hospital, as indicated on the tape
10 recording you just listened to, did you tell
11 anybody else at the scene that Officer
12 Schoolcraft had to go to the hospital?

13 MR. RADOMISLI: Objection to
14 form.

15 A. Lieutenant Hanlon was the only
16 individual.

17 Q. You told her that he had to go
18 to the hospital?

19 MR. RADOMISLI: Objection to
20 form.

21 A. Yes.

22 Q. When did you tell her that?

23 A. While I was -- after evaluating
24 him for his blood pressure.

25 Q. Did you hear yourself saying